

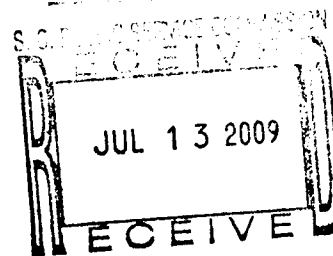


DEPARTMENT OF THE ARMY  
UNITED STATES ARMY LEGAL SERVICES AGENCY  
901 NORTH STUART STREET  
ARLINGTON VA 22202-1837

REPLY TO  
ATTENTION OF

JUL 10, 2009

Regulatory Law and IP Division  
U 4191



Subject: Docket 2009-220-C

Charles L.S. Terreni  
Chief Clerk and Administrator  
SC Public Service Commission  
PO Drawer 11649 (29211)  
101 Executive Center Drive  
Suite 100  
Columbia, SC 29210

Re: In the Matter of the Joint Application of Frontier Communications Corporation, New Communications of the Carolinas, Incorporated, New Communications Online and Long Distance, Incorporated, Verizon South, Incorporated, Verizon Long Distance, LLC and Verizon Enterprise Solutions, LLC for Approval of the Sale of Assets and the Transfer of Authority and Certificates  
Docket No. 2009-220-C

Dear Mr. Terreni:

Enclosed for filing please find, dated July 10, 2009, the original and 11 copies of a Petition to Intervene on behalf of the United States Department of Defense and all other Federal Executive Agencies (DOD/FEA), in the above-referenced proceeding. By copy of this letter and certificate of service, a copy is being served on all parties of record.

Inquiries to this office regarding this proceeding should be directed to the undersigned at (703) 696-2852. My fax number is (703) 696-2960.

Sincerely,

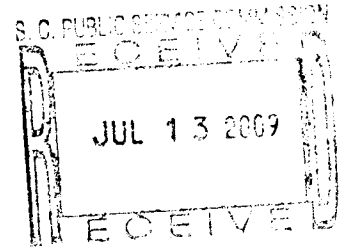
  
TERRANCE A. SPANN  
Attorney for DOD/FEA

Enclosure:  
Petition to Intervene, dated 7/10/09

BEFORE THE  
PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA

DOCKET NO. 2009-220-C

Joint Application of Frontier Communications Corporation, New Communications of the Carolinas, Incorporated, New Communications Online and Long Distance, Incorporated, Verizon South, Incorporated, Verizon Long Distance, LLC and Verizon Enterprise Solutions, LLC for Approval of the Sale of Assets and the Transfer of Authority and Certificates	) The United States Department of Defense and all other Federal Executive Agencies
-----	) Petition for Leave to Intervene and
	)
	)
	)
	)
	)
	)



PETITION TO INTERVENE

The Secretary of Defense, through duly authorized Counsel, on behalf of the consumer interest of the United States Department of Defense and all other Federal Executive Agencies (collectively referred to herein as DOD/FEA), hereby petitions the Public Service Commission of South Carolina ("the Commission") for leave to intervene in the above-captioned proceeding. This petition is filed pursuant to the Commission's Notice of Filing and Hearing of the Joint Application of the above referenced parties. As grounds for this petition, your petitioner states:

I

That he is duly authorized by law to make and file this petition. That the name, title, address, telephone number, facsimile number of the person to whom communications should be addressed is:

Terrance A. Spann  
Attorney,  
Regulatory Law and Intellectual  
Property Division (JALS-RL)  
U.S. Army Legal Services Agency  
Department of the Army  
901 N. Stuart Street, Suite 700  
Arlington, VA 22203-1837  
Email [Terrance.Spann@hqda.army.mil](mailto:Terrance.Spann@hqda.army.mil)  
Telephone: (703) 696-2852 /Fax: (703) 696-2960

We also respectfully request the addition to the Official Service list of:

Harry Gildea  
Snavely King Majoros O'Connor & Bedell, Inc.  
1111 14<sup>th</sup> Street N. W. Suite 300  
Washington DC 20005  
Email [hgildea@snavely-king.com](mailto:hgildea@snavely-king.com)  
Telephone: (202) 371-0604/Fax: (202) 842-4966

II


That the interests of the DOD and the Federal Executive Agencies, as large consumers of telecommunications services in the state of South Carolina is manifest. The above referenced sale of assets and transfer of authority and certificates is of interest to and will have an affect on the DOD/FEA as a consumer of telecommunications services.

III

That the interest of DOD/FEA is such that it cannot be adequately protected by any other party. The intervention of petitioner will neither unduly broaden the issues nor unduly delay the proceeding. The consumer interest of DOD has been recognized, and DOD has previously participated as an intervener, in regulatory cases before this Commission.

WHEREFORE, your petitioners pray for leave to intervene and be treated as a party hereto with right to have notice of and appear at the taking of testimony, produce and cross examine witnesses, and be heard through counsel, upon brief and at oral argument, if oral argument is granted.

Respectfully Submitted,

  
TERRANCE A. SPANN  
Attorney

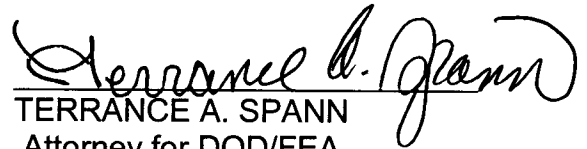
Regulatory Law and Intellectual  
Property Division (JALS-RL/IP)  
U.S. Army Legal Services Agency  
Department of the Army  
901 N. Stuart Street, Suite 700  
Arlington, VA 22203-1837

For  
THE DEPARTMENT OF DEFENSE  
And  
ALL OTHER FEDERAL EXECUTIVE AGENCIES

CERTIFICATE OF SERVICE

I hereby certify that on 13 July 2009, I will serve a copy of the foregoing document, together with this Certificate of Service, upon the following parties, by causing a copy hereof to be delivered by United States, postage prepaid mail; and electronically mailed and properly addressed to each such party.

Executed July 10, 2009, at Arlington, Virginia.

  
TERRANCE A. SPANN  
Attorney for DOD/FEA

# Service List For Docket 2009-220-C

**Summary:** Joint Application of Frontier Communications Corporation, New Communications of the Carolinas, Incorporated, New Communications Online and Long Distance, Incorporated, Verizon South, Incorporated, Verizon Long Distance, LLC and Verizon Enterprise Solutions, LLC for Approval of the Sale of Assets and the Transfer of Authority and Certificates

**Industry:** Telecommunications

**Opened:** 6/01/09

## Representatives

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